



UNITED ENERGY

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Marc Tutaan  
Australian Energy Market Commission  
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Dear Mr Tutaan

**AEMC Draft Rule Determination – AEMO proposal provision of metering data services and clarification of existing metrology requirements**

United Energy Distribution (UED) appreciates the opportunity to respond to the Australian Energy Market Commission (AEMC) Draft Rule Determination – Australian Energy Market Operator (AEMO) proposal provision of metering data services and clarification of existing metrology requirements.

The AEMC states in the Draft Rule Determination:

'The Commission is satisfied that the Draft Rule will, or is likely to, contribute to the achievement of the National Electricity Objective (NEO) because:

- creating a new category of metering data provider in the Rules will remove complex administrative arrangements currently in place and result in more transparent, clearer and simplified regulation of such service providers. This would promote regulatory certainty, reduce compliance risks and directly contribute to productive efficiency gains;
- conferring the Financially Responsible Market Participant (FRMP) with the responsibility for the provision of metering data services with respect to metering installation types 1-4 places the obligation on the party that receives a clear and direct benefit from the provision of these services and is best able to bear this responsibility. However, the Local Network Service Provider (LNSP) may voluntarily place an offer to be responsible for the provision of metering data services for a particular metering installation. This approach would promote the efficient investment in and operation of electricity services; and
- restructuring Chapter 7 of the Rules, modifying definitions, creating a conceptually distinct 'metering data services database' and clarifying the use of

metering data terms ensures that the regulation of metrology matters in the National Electricity Market (NEM) is clear, coherent and consistent and would promote regulatory certainty and reduce the regulatory costs of compliance.<sup>1</sup>

### **Responsibility for Metering Data Services**

AEMO sought to transfer the responsibility for remote acquisition onto another party due to the following:

- Remote collection of data is not a core function of AEMO's;
- Remote collection of data is now well established in the market compared to NEM start;
- Remote collection will become more common with the introduction of new technologies and it would not be appropriate for AEMO to be responsible; and
- AEMO is responsible for accreditation processes and it would be more appropriate segregation of duties if AEMO do not perform the function as well.

AEMO analysed two responsibility options for the selection of metering data services for meter types 1-4:

- The FRMP; or
- The Responsible Person (RP) role.

The original AEMO proposal recommended that the RP role be responsible for the meter provision services and the metering data services.

Several responses in the initial consultation have resulted in the AEMC, adopting the FRMP responsibility model for the following reasons:

- The FRMP receives direct and clear benefit benefits from the provision of metering data services and this would represent an incremental change that is consistent with current operational practice; and
- Conferring a new regulatory obligation on the Transmission Network Service Providers (TNSP)/LNSP without there being any ostensible efficiency benefit was seen as inappropriate.

The AEMC recognise that as a consequence of the decision to adopt the FRMP responsibility model that it will not necessarily follow that there would be one party responsible for end to end metering, collection and processing of data.

The AEMC has sought views on the FRMP responsibility model for metering data services for meter types 1-4 (with voluntary LNSP offer to provide these services) vs the alternative to extend the framework for the RP being responsible for meter provision and metering data services across all meter types.

We note that the Grid Australia submission was concerned with the TNSP ability to provide metering data services where they did not have the capacity to meet the requirements. Where TNSP's or LNSP's were placed in this situation there is always the opportunity to either provide or procure from competitive metering data service providers which is no different than the FRMP's procuring this capability. It appears that a few hundred wholesale,

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<sup>1</sup> AEMC Rule Determination, National Electricity Amendment (Provision of Metering Data Services and Clarification of Existing Metrology Requirements) Rule 2010, 6 May 2010, p5

boundary or virtual National Meter Identifier's (NMI's) have influenced the efficiency argument for thousands of type 1-4 connections points in the NEM.

These boundary and virtual NMI's are a specialised area of metering and data services, we recommend that the knowledgeable resources across industry should be responsible for these connection points to ensure the integrity of the settlement data. We do not agree with the AEMC view that accreditation processes which cover the run of the mill metering arrangements for each meter type can adequately deal with the complexity and intimate knowledge required of these special connection points, including metering algorithms.

We recommend that AEMO be the RP and responsible for metering for these boundary connection points and that AEMO in ensuring the integrity of the market remain responsible for the metering data services for these connections points. Where AEMO is the RP, they should be obliged to select the TNSP as the MP given the access issues, knowledge etc. All remaining connection points can efficiently be covered by the RP framework (FRMP or LNSP) being consistently applied across all meter types, where the RP is responsible for end to end processes from metering to data collection and processing.

AEMO's reasoning for the RP responsibility model is that remote collection of metering data will become more common with the introduction of new technologies across all metering installation types. The AEMC appear to disregard the efficiency benefits from having one party accountable end to end. As technology selection and technology implementation becomes more varied and complex, it is important that one party is held accountable. It is not efficient to establish a framework where metering provider and metering data service provider offerings may not be compatible and no party is accountable. The Draft Rule Determination results in every Meter Data Provider (MDP) needing to have communication and back office capability to cover all the technology options, alternatively the metering providers need to have every version of communication technology interface that is able to work with each MDP's communication network and technology selection sitting on the shelf. Potentially no one party in the NEM will be responsible for ensuring that this framework works consistently and reliably end to end. The AEMO proposal made more sense from a practical, operational and efficiency viewpoint than the proposed model in the Draft Rule Determination.

Whilst UED support the MDP role being incorporated into Chapter 7, we support the single responsible party across metering, collection and data processing across all meter types. UED support the RP role being responsible for the selection of the MP and MDP and being responsible for the metering, collection and data processing across meter types 1-7.

The AEMC raised concerns regarding the RP responsibility for metering provision and metering data provision as this conferred a regulatory obligation on the LNSP to offer to provide both metering provision and metering data provision services across for meter types 1-4. The AEMC did not consider that there was an efficiency benefit in this arrangement. The AEMC suggested that the LNSP could make a commercial decision to voluntarily offer to provide metering data provider services, this voluntary offer model could also be extended to the meter provision. This overcomes the AEMC's efficiency concerns with the RP responsibility for metering provision and metering data provision.

UED has provided detailed drafting comments in the Attachment. Many of these drafting comments indicate a disconnect between the Draft Rule Determination reasoning and the appropriate allocation of roles and responsibilities that should flow from the AEMC Draft Rule

Determination into the Rules drafting. We recommend that the AEMC work with industry and AEMO to ensure that the Final Determination and Final Rule are consistent and clearly drafted.

**UED support the;**

- **MDP role being incorporated into Chapter 7;**
- **The RP role being responsible for the selection of the MP and MDP and being responsible for the metering, collection and data processing across meter types 1-7 as the sensible framework to move forward with given the emerging technologies;**
- **For the more complex boundary connections, the RP (AEMO) being responsible for the metering and remaining responsible for the metering data services; and**
- **We recommend that the AEMC work with industry and AEMO to ensure that the Final Determination and Final Rule are consistent and clearly drafted.**

### **Smart Metering Arrangements**

We recognise that that the AEMC state in the Draft Rule Determination that they have decided not to address issues raised pertaining to smart metering developments. The AEMC consider that it is more appropriate that this Rule change be kept separate from smart metering.

Despite this, many of the drafting changes directly impact the Victorian smart metering rollout and place significant obligations attributable as required for the large customers in the NEM, now directly on small customers. This additional burden will translate into additional costs for small customer metering for very limited if any benefit and will not contribute to the NEO.

Obligations required for large customers who may have some impact on market settlement and who are currently serviced from old communication technology should remain and be limited to types 1-4. These obligations are impractical and are not suited to small mass market customers who may be receiving smart meters as part of roll outs or trials.

An example is the obligation for the LNSP to arrange for the provision of metering data to AEMO if remote acquisition is unavailable in clause 7.2.3 (k) (3) for meter types 5-7.

Five LNSPs responded that this clause is impractical if remote communications become unavailable. Under smart metering, there is an expectation that the benefits will be realised to customers. This includes the transition from a manual read workforce and manual reading equipment and uploading metering data at volume to remote data collection.

There has never been a need in the market to provide back-up arrangements for meter types 5-7 previously. When access to a meter was denied an estimated read was provided to cover for a three month period. This profiled estimated read was sufficient for financial settlement of the market.

In addition settlement in the market has been based on forward forecast metering data which has been profiled. For these small customers there has been no need to provide actual data to the market for initial financial settlement purposes. This is a cost impost on these customers and does not contribute to the NEO.

The AEMC stated reasons that smart metering issues will not be addressed has not been reflected in the Draft Rule where in fact issues have been explicitly or inadvertently created.

**We suggest that the AEMC be sensitive to the smart metering issues being created by this Draft Rule Determination which we have highlighted in our detailed drafting suggestions. The AEMC should seek to limit the impact of these cost imposts and the increased regulatory burden until the National Stakeholder Steering Committee/Standing Committee of Officials (NSSC/SCO) put forward a more considered Rule change proposal for national smart metering in line with the AEMC stated reasons.**

### **Service Level Procedures**

The AEMC reasons state:

'In relation to Service Level Procedures, the Commission considers that separate Service Level Procedures are currently necessary because it would not be feasible to amalgamate the Service Level Procedures with the Metrology Procedure at present.

However, the Commission has sought to remove any apparent duplication in the Rules relating to the Service Level Procedures with the Rules relating to the Metrology Procedure. The Commission recommends that these Service Level Procedures and the Metrology Procedure be reviewed over time with the view to harmonising these procedures in the future.<sup>2</sup>

UED is supportive of all AEMO procedures, documents and guidelines being established and maintained in accordance with Rules consultation procedure as required in Rule 7.1.3 (a) and (b). UED note that the list of documents in (a) includes all AEMO documents specified in Chapter 7. We recommend that the drafting refer to all documents specified in Chapter 7 and all documents relevant to Chapter 7 (except those specified in Rule 7.2A). UED consider that it is important that all documentation relevant to Chapter 7 or service providers roles and obligations is subject to open and transparent Rules consultation with clear justification of amendments and how the changes contribute to the NEO.

AEMC consider it necessary to create Service Level Procedures as it is not feasible to amalgamate these Service Level Procedures with the Metrology Procedure.

We query this position of the AEMC. There are a number of individual Service Level Requirements documents for meter providers and meter data providers. These documents have significant overlap with Rule obligations or existing metrology obligations so it is not a simple matter of re-badging the documents into one new Service Level Procedure. This will require Rules consultation.

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<sup>2</sup> Ibid, p7

Further these Service Level Requirements and the Metrology Procedure will need to be updated to reflect the Final Rule on the responsibility model and other Rules amendments. This will also require Rules consultation on the Metrology Procedure.

The AEMC states that they have sought to remove any apparent duplication in the Rules relating to Service Level Procedures with the Rules relating to the Metrology Procedure. This does not appear to be the case due to the following;

- There is still significant overlap between the two procedures as outlined in the table below which makes obligations unclear and confusing;
- Rules have now been drafted to provide data delivery timeframe obligations in two procedures which does not provide for a good clear regulatory framework;
- To the extent of any inconsistency it is not clear which procedure will take precedence; and
- Both procedures have a catch all phrase so they may be amended over time to include any other matters, so even if duplication were removed and the intent of each procedure was clear in the Final Rule, it may not be maintained in that manner over time.

Locating the head of power Rules for Metrology and Service Level Procedures close together does not resolve the problem of the extensive overlap and the lack of clarity of clear purpose and scope so that overlap can still be reduced in the initial procedures and maintained easily on an ongoing basis.

The table below indicates the extensive overlap.

7.14A	The <i>service level procedures</i> must include:	7.14.1 (c)	The <i>metrology procedure</i> must include
7.14.1A (c) (1)	the services associated with the provision, installation and maintenance of metering installations by Metering Providers;	7.14.1 (c) (2)	(2) the requirements for the provision, installation and maintenance of <i>metering installations</i> ;
7.14.1A (c) (2)	requirements for the systems and processes for the collection, processing and delivery of metering data by Metering Data Providers;	7.14.1 (d)	Metering data providers must comply with both parts of the Metrology Procedure. The Metrology Procedure deals with the roles and obligations, including the data collection, processing and delivery requirements.
7.14.1A (c) (3)	the performance levels associated with the collection, processing and delivery of metering data	7.14.1 (c) (4) (iii)	the performance standards for <i>metering data</i> required for the purpose of <i>settlements</i> ;
7.14.1A (c) (4)	the data formats that must be used for the delivery of metering data	7.14.1 (d)	Metering providers and metering data providers must comply with the Metrology Procedure. The obligation to use the data file format is covered in Metrology Procedure part A.
7.14.1A (c) (5)	the management of relevant NMI Standing Data	7.2.8 (d)	The registered participants and the metering service providers (MP and MDP) have an obligation to comply with the MSATS Procedures. These procedures outline the relevant NMI standing data that is required to be established or maintained by each party. These requirements do not need further duplication.
7.14.1A (c) (6)	the requirements for the	7.14.1 (c) (6)	As noted above 7.14.1 (d) requires

	processing of metering data associated with connection point transfers and the alteration of metering installations where one or more devices are replaced ('meter churn'); and		that the metering providers and metering data providers must comply with the Metrology Procedure. Clause 7.14.1 (6) covers the data processing requirements; (6) procedures for: (i) the validation and substitution of metering data in accordance with clause 7.11.2; (ii) the estimation of metering data for the purposes of clause 7.11.1; and  Further the meter data churn management rules are already covered in the existing metrology procedure.
7.14.1A (c) (7)	other matters in the Rules required to be included in the service level procedures.	7.14.1 (c) (7)	other matters in the <i>Rules</i> required to be included in the <i>metrology procedure</i> .

UED has highlighted the extent of overlap by the creation of the Service Level Procedures. We are keen that the documentation structure is clear and efficient in order that it better meets the NEO.

We do not agree that the AEMC in their stated reasons have sought to remove any apparent duplication, the Draft Rule indicates that this is clearly not the case.

The AEMC recommends that these two sets of procedures may be harmonised over time but it is not feasible to do this now. The Draft Rule has not provided clear heads of power that allow for clear differentiated purpose and scope so that the overlap is minimised at the outset of the creation of the Service Level Procedure and is manageable moving forward. Without this clarity of the role of each procedure, each procedure will have to maintain the overlap, complexity and possible inconsistency moving forward as AEMO would not be complying with the Rules if the matters were not covered off in each procedure.

**We do not agree that the AEMC in their stated reasons have sought to remove any apparent duplication between the Metrology Procedure and the new Service Level Procedures, the Draft Rule indicates that this is clearly not the case.**

**The Draft Rule has not provided clear heads of power that allow for clear differentiated purpose and scope so that the overlap is minimised at the outset of the creation of the Service Level Procedure and is manageable moving forward.**

**Without this clarity of the role of each procedure, each procedure will have to maintain the overlap, complexity and possible inconsistency moving forward as AEMO would not be complying with the Rules if the matters were not covered off in each procedure. This does not deliver a good regulatory framework. The Final determination and Rule should not proceed until a clear, concise and differentiated purpose can be drafted in the Final Rule.**

Should you have any questions regarding this submission, please feel to contact me on (03) 8540 7819.

Yours sincerely

Verity Watson

Manager Regulatory Strategy

## Attachment

Clause Number	Clause	Issue	Response
7.1.3 (b)	The procedures authorised by <i>AEMO</i> must be established and maintained by <i>AEMO</i> in accordance with the <i>Rules consultation procedures</i> .	<p>The procedures, documents or guidelines specified in Chapter 7 and all the documents relevant to Chapter 7 referred to in clause (e) should be established and maintained in accordance with <i>Rules consultation procedures</i>.</p> <p>It is important that amendments to all the documentation required to support Chapter 7 are subject to open and transparent consultation processes that provide</p>	The procedures authorised by <i>AEMO</i> ( <u>including documents such as guidelines or documents relevant to Chapter 7, except those referred to in Rule 7.2A</u> ) must be established and maintained by <i>AEMO</i> in accordance with the <i>Rules consultation procedures</i> .
7.2.1 (a)	(a) The <i>responsible person</i> is the person responsible for the provision, installation and maintenance of a <i>metering installation</i> in accordance with this Chapter 7, the <i>metrology procedure</i> and procedures authorised under the <i>Rules</i>	The responsibility of the responsible person should be expanded to cover the selection of the Metering Data Services as proposed in the initial rule by <i>AEMO</i> . Clause 7.2.1 (a) should be split into provision of the metering installation in (a) (1) and provision of metering data services in (a) (2).	UED recommend that the original drafting be re-instated (1) the provision, installation and maintenance of a metering installation; <u>and</u> (2) <u>the provision of metering data services in relation to each metering installation for which it is responsible;</u>
7.2.2 (e) and 7.2.3 (l)	<i>AEMO</i> must establish guidelines in relation to the role of the <i>financially responsible Market Participant</i> consistent with this Chapter 7. <i>AEMO</i> must establish guidelines in relation to the role of the <i>Local Network Service Provider</i> consistent with this Chapter 7.	<i>AEMC</i> has provided no justification for these new guidelines or how these new guidelines contribute to further the NEO. The market has been operating effectively for a decade without them. Any new or changed obligation on the FRMP or LNSP in selecting and being responsible for the MP and MDP roles should be included in the Metrology Procedure as opposed to creating more documents. This is consistent with the drafting the <i>AEMC</i> has proposed in 7.14.1 (c) (3), ie that the obligations of the RP, FRMP, LNSP, MP and MDP must be clearly documented in the	Clause 7.2.2 (e) and 7.2.3(l) should be deleted.

Clause Number	Clause	Issue	Response
		<p>Metrology Procedure.</p> <p>In addition there is already a guideline for the RP role in Chapter 7, it is unnecessary to create even more guidelines.</p> <p>The more documentation that is created, the more the regulatory burden to ensure that consistency across the documents is maintained and that industry understand the regulatory environment. In addition to the Rules, there are at least 40 other documents, procedures and guidelines with more detailed procedures and obligations. It would be useful to contain the expansion of documentation to a very clear structure that does not create more duplication and overlap.</p>	
7.2.3 (k) (3)	<p>arrange for the provision of relevant <i>metering data</i> to AEMO if <i>remote acquisition</i>, if any, becomes unavailable.</p>	<p>Five LNSPs responded that this clause is impractical if remote communications become unavailable. Under smart metering, there is an expectation that the benefits will be realised to customers. This includes the transition from a manual read workforce and manual reading equipment and uploading metering data at volume to remote data collection.</p> <p>There has never been a need in the market to provide back up arrangements for meter types 5-7 previously. When access to a meter was denied an estimated read was provided to cover for a three month period. In addition settlement in the market has been based on forward forecast metering data which has been profiled. For these small customers there has been no need to</p>	<p>Delete 7.2.3 (k) (3). If the AEMC continue to proceed with this clause we suggest that there is a transitional provision introduced that covers all Victorian AMI meters installed and covered by the Victorian derogation so that they are not subject to this Rule. Without the removal of this clause or the transitional provision the Victorian AMI derogation and the AMI cost/benefit case will not be preserved.</p>

Clause Number	Clause	Issue	Response
		<p>provide actual data to the market for initial settlement purposes. This is a cost impost on these customers and does not contribute to the NEO.</p> <p>The AEMC suggest that this Rules consultation does not and should not cover smart metering, yet this Rule has a significant impact and extra burden on small customers in Victoria.</p> <p>We recognise that Victorian AMI may have been inadvertently caught by this provision. The clause should be removed, where actual meter data is unable to be collected then estimates or substitutes are provided into the market. This is already covered in the Metrology Procedure Part B, AEMO performance reporting of service levels and accreditation processes.</p>	
7.2.5 (d) (9)	allow the alteration of the installation for which that person is responsible with another installation in accordance with clause 7.3.4.	<p>In the last round of consultation, UED as an LNSP and RP sought to be notified of an impending meter exchange prior to the exchange taking place so that our assets and requirements can be managed. Our earlier proposal did not seek to limit in anyway the parties rights to competitive metrology services, where such rights exist under the Rules.</p> <p>It is important that the reasonable rights of the RP/LNSP are recognised where there is a meter exchange.</p> <p>Where a Victorian AMI meter is integrated into the electricity network operations and is used to move</p>	UED recommends a new clause 7.2.5 (d) (10) which ensures that the reasonable requirements of the LNSP and RP will be met before arranging for the replacement or alteration of a metering installation.

Clause Number	Clause	Issue	Response
		towards a smart network, these benefits in the AMI roll out will be lost without this provision.	
7.2.5 (ab)	Old clause- AEMO powers to select the MDP for boundary/wholesale metering points	<p>AEMC deleted this clause as the specific market requirements are covered by accreditation and by AEMO's discretion to intervene in the market through accreditation processes.</p> <p>Where AEMO has discretion to intervene in the market, this should be clearly stated in the Rules rather than providing for the discretion in a set of accreditation documents developed and managed by AEMO. There is an obvious conflict of interest that the AEMC should recognise.</p> <p>Boundary or wholesale meters, virtual metering etc is a very specialised area and needs the input and agreement of a number of parties – AEMO, TNSP, LNSP, Local retailer etc. Accreditation processes are based on satisfactory process, procedures for certain meter types as opposed to this specialised area. We consider that it is not appropriate that these points might churn to various MP and MDP's. The skills required to manage these special metering points is generally not a core skill of the FRMP.</p>	<p>AEMO's ability to select the parties responsible for metering provision and metering data services for these connection points should be re-introduced.</p> <p>For these specialised NMI's we suggest that the TNSP provide the metering provision services to AEMO as RP, and that AEMO select and be responsible for the meter data services.</p>
7.2.5 (d) (1) and (2)	<p>(1) ensure that the installation is provided, installed and maintained in accordance with the <i>Rules</i>, the <i>metrology procedures</i> and procedures authorised under the <i>Rules</i>;</p> <p>(2) ensure that the components,</p>	<p>UED note that there are approximately 40 procedures listed or published under Chapter 7. Most of these have undergone Rules consultation processes.</p> <p>In the interests of a manageable regulatory framework, we suggest that the Rules and</p>	The responsible person's obligation and relevant procedures should be clearly stated. The wording and 'procedures authorised under the Rules' should be replaced with a reference to the specific

Clause Number	Clause	Issue	Response
	accuracy and testing of the installation complies with the requirements of the <i>Rules</i> , the <i>metrology procedure</i> and procedures authorised under the <i>Rules</i>	Procedures be well structured and appropriate. The procedures that are required for Chapter 7 should be clearly expressed in Chapter 7 with a scope and no overlap with other procedures. AEMO or IEC are then able to amend the procedures as required, rather than growing the list of procedures, including the administrative burden of managing these procedures. Growing the number of procedures and the quantity of paper does not contribute to the NEO.	procedures that must be complied with. There should also be new provisions which specifically and clearly authorise the content and governance arrangements for those procedures.
7.3.1 (a) (8)	(8) have a <i>measurement element</i> for <i>active energy</i> and if required in accordance with schedule 7.2 a <i>measurement element</i> for <i>reactive energy</i> , both of which are recorded;	<p>A measurement element is a physical piece of hardware in the meter. There should be no requirement to have a separate measurement element for active energy and a separate measurement element for reactive energy.</p> <p>The requirements should be for the metering installation to record active and reactive energy from a single measurement element.</p>	(8) have a <i>measurement element</i> for <i>active energy</i> and if required in accordance with schedule 7.2 a <del><i>measurement element</i></del> for <u>also record reactive energy</u> , both of which are recorded
7.3.1 (g)	Where a <i>metering installation</i> is used for purposes in addition to the provision of <i>metering data</i> to AEMO and persons eligible to receive <i>metering data</i> under clause 7.7, then the <i>Responsible Person</i> when agreeing to any additional purpose(s) under paragraph (c) must use reasonable endeavours to ensure that: (1) that use must not cause an infringement of the requirements of the	<p>The AEMC proposal states that the MDP may be approached directly to provide enhanced services or other data requirements.</p> <p>The FRMP or LNSP has no control over these arrangements. It is not appropriate for these requirements to be placed on the RP to direct traffic for an unknown level of commercially negotiated other services.</p> <p>7.3.1 (g) contemplates the RP agreeing to any additional purpose. However the Draft Rule does not require the MDP to advise any additional uses, let alone seek the agreement of the RP prior to</p>	The provision needs to be amended to start “With the agreement of the Responsible Person, where...”.

Clause Number	Clause	Issue	Response
	<p><i>Rules;</i>            (2) the <i>responsible person</i> must co-ordinate with the persons who use the <i>metering installation</i> for such other purposes; and            (3) the <i>metering installation</i> must comply with the requirements for operational <i>metering</i> as detailed in Chapter 4 of the <i>Rules</i>.</p>	<p>entering into the commercial arrangements.</p> <p>7.3.1 (c) allows the LNSP or FRMP, with the agreement of the RP to seek additional features of the metering installation. The drafting does not cater for RP agreement of additional services which may be directly negotiated with the MDP.</p> <p>Is the AEMC contemplating that only the LNSP or FRMP will seek to negotiate additional services from the MDP. That is no other party will ever want additional services?</p>	
7.3.7 (b)	<p><i>AEMO</i> must establish and <i>publish</i> a procedure applicable to the provision of exemptions for the purpose of paragraph (a) and <i>AEMO</i> may revise the procedure from time to time.</p>	<p>Suggest that the following words be deleted as they are unnecessary, 'and <i>AEMO</i> may revise the procedure from time to time'.</p> <p><i>AEMO</i> has the right to amend any procedures, documents or guidelines using Rules consultation processes in clause 7.1.3 (b).</p>	<p><i>AEMO</i> must establish and <i>publish</i> a procedure applicable to the provision of exemptions for the purpose of paragraph (a) and <del><i>AEMO</i> may revise the procedure from time to time.</del></p>
7.4.2 (bc)	<p>The requirements referred to in paragraph (bb) must be included in the guidelines established under paragraph (ba) and may include, among other things, requirements relating to cooperation with <i>AEMO</i> and any person engaged by <i>AEMO</i> to operate any relevant <i>agency metering database</i>, the confidentiality of information</p>	<p>The concept of meter data agents as agents for <i>AEMO</i> is being removed in this Rule change proposal. The reference to the agency database should be removed.</p> <p>The drafting of 7.4.2 (bb) suggest that the MP must comply with the provisions of the Rules, guidelines and with the requirements of (bc). The drafting in (bc) may include the drafted listed among other things. The AEMC in response to Citipower/Powercor and SPAusNet has agreed that the list of obligations should no longer be non-exhaustive.</p>	<p>Delete the following drafting: 'among other things,' 'and any person engaged by <i>AEMO</i> to operate any relevant agency metering database'</p>

Clause Number	Clause	Issue	Response
	<p>collected by <i>Metering Providers</i>, the resolution of disputes between <i>AEMO</i> and <i>Metering Providers</i>, the access of <i>AEMO</i> to and the inspection and audit by <i>AEMO</i> of any equipment or database maintained by <i>Metering Providers</i>, the insurance which must be taken out by or on behalf of <i>Metering Providers</i>, subcontracting by <i>Metering Providers</i>, the software and systems that are used by <i>Metering Providers</i>, maintenance of quality systems accreditation, the ownership of intellectual property that is developed or used by <i>Metering Providers</i>, and the delivery up to <i>AEMO</i> of data, works, material and other property that <i>AEMO</i> has the right to in the event of the deregistration of a <i>Metering Provider</i>.</p>	<p>We suggest that the words 'among other things' be deleted.</p>	
7.4.2A (f)		Refer to comments above	Delete the following drafting: 'among other things,' 'and any person engaged by AEMO to operate any relevant agency metering database'
7.4.3 (a)	<i>AEMO</i> must establish a procedure in	The Metering Service Provider Registration	Include a transitional provision

Clause Number	Clause	Issue	Response
	<p>accordance with the <i>Rules consultation procedures</i> for deregistration of <i>Metering Providers</i> and <i>Metering Data Providers</i>.</p>	<p>Procedure, Part 1 already covers deregistration and refers to the Service Provider Compliance Assessment Procedure. There is no need for a further procedure to be created in addition to the Rule 7.4.3, and the documentation that already exists, to separately cover further detail on deregistration.</p> <p>The AEMC state that a new procedure is required so that further detail on deregistration can be provided. A further procedure to add to the dozens of procedures is unjustified and does not contribute to the NEO.</p> <p>Given the move from an MDA to MDP arrangement, the procedures referred to above will already need to be updated. To the extent that AEMC or AEMO consider that any requirements/obligation at the detailed level for deregistration is missing, it can be addressed in the Rules consultation.</p>	<p>that the existing Metering Service Provider Registration Procedure is a procedure for the purposes of clause 7.4.3(a).</p>
7.4.3 (b)	<p>If <i>AEMO</i> reasonably determines that a <i>Metering Provider</i> or a <i>Metering Data Provider</i> has breached the provisions of the <i>Rules</i> or of procedures authorised under the <i>Rules</i> that applies to <i>Metering Providers</i> or <i>Metering Data Providers</i> then:</p>	<p>The current Rule requirements refer to ‘materially breaches the requirements’.</p> <p>The AEMC consider that the AEMO process is consultative and (disputes) currently dealt with under the Service Provider Compliance Assessment Procedure. UED note that this compliance assessment procedure is highly subjective and open to interpretation which may result in different assessments of levels of compliance. Further the process offers no dispute path for a MP or MDP who disagrees with the</p>	<p>We suggest that materiality still be included in the drafting.</p>

Clause Number	Clause	Issue	Response
		<p>outcomes or constraints. UED recommend that the Rules drafting still require materiality before more intrusive avenues and constraints are adopted.</p> <p>SPAusNet raised that there is no provision in 7.4.3 for a MP or MDP to dispute AEMO's assessment of the severity of AEMO's action. UED agree that the MP or MDP should be able to dispute the level of severity, constraints or deregistration. This is not covered in the AEMO compliance process.</p> <p>UED seek assurance from the AEMC that the proposal under 8.2 covers this situation.</p>	
7.7 (c)	The <i>responsible person</i> must ensure that access is provided to <i>metering data</i> from the <i>metering data services database</i> to persons eligible to receive <i>metering data</i> in accordance with paragraph (a).	<p>The FRMP or LNSP are responsible for the metering data services and for selecting the MDP in the AEMC Rule Determination. This clause as currently proposed in the Draft Rule is not consistent with the AEMC Rule Determination.</p> <p>The mark up of the draft Rule refers to the FRMP or LNSP which is consistent with the AEMC Rule Determination.</p> <p>In line with earlier comments, the RP should be responsible for both meter provision and meter data provision.</p>	UED support the RP being responsible for both meter provision and meter data provision. We support the Draft Rule in preference to the mark up of the draft Rule.
7.7 (g) and 7.12 (f)	The <i>Metering Provider</i> must provide electronic access to the <i>metering installation</i> to facilitate the requirements of paragraph (b) and electronic or	The MP only provides access to energy data in the metering installation in 7.7 (b) if there are electronic passwords available. The absolute obligation in the drafting in 7.7 (g) should be subject to password access being available in 7.7	AEMC needs to review the drafting in 7.7 (g) to ensure its consistency with other parts of Chapter 7, including 7.8.2.

Clause Number	Clause	Issue	Response
	physical access, as the case may be, to the <i>metering installation</i> to facilitate the requirements of rule 7.12(f).	(b).  If the MP provides electronic access to the MDP to reset the clock in 7.12 (f), this is essentially a write access and may allow the MDP to inadvertently reset the meter configurations. These are items which the RP is responsible for and the MP actions. UED are uncertain whether the proposed capability for the MDP and obligations on the MP are appropriately matched in the Draft Rule.	
7.8.2 (e)	(e) The <i>Metering Provider</i> must forward a copy of the passwords held under clause 7.8.2(d) to <i>AEMO</i> on request by <i>AEMO</i> .	AEMC has clearly stated in the Rule Determination that AEMO no longer need to perform the remote acquisition functions and AEMO are attempting to remove their responsibility for meter data services, hence it is unclear why AEMO would need the meter passwords in other than the step in rights outlined in clause 7.4.2A (f).  Fo smart meters where many meters are connected on a communication network, passwords will be changing frequently to ensure that the integrity of the data is maintained. Regular provision of changing passwords will not only be useless for AEMO but will place an additional and unnecessary cost burden on the smart meter roll out.	The drafting should be limited to meter types 1-4; 'The <i>Metering Provider</i> must forward a copy of the <u>passwords for meter types 1-4</u> held under clause 7.8.2(d) to <i>AEMO</i> on request by <i>AEMO</i> .
7.8.2 (g)	(g) Subject to the authorisation of the <i>responsible person</i> , if a customer of a <i>financially responsible Market</i>	The drafting in 7.8.2 (g) is inconsistent with the drafting in 7.8.2 (c) where the MP must allocate the read only password without any authorisation or mention of the RP.	

Clause Number	Clause	Issue	Response
	<p><i>Participant</i> requests a 'read-only' password, the <i>financially responsible Market Participant</i> must:</p> <p>(1) obtain a 'read-only' password from the <i>Metering Provider</i>, and</p> <p>(2) provide a 'read-only' password to the customer within 10 <i>business days</i>, in accordance with paragraph (c).</p>		
7.8.2(i)	<p>(i) The <i>Metering Provider</i> must allocate suitable passwords to the <i>Metering Data Provider</i> that enables the <i>Metering Data Provider</i> to collect the <i>metering data</i> and to maintain the clock of the <i>metering installation</i> in accordance with clause 7.12.</p>	<p>Refer to our comments on clause 7.8.2 (e). The drafting should be restricted to simple type 1-4 meters using older style point to point technology.</p>	<p>The drafting should be amended:</p> <p>'The <i>Metering Provider</i> must allocate suitable passwords to the <i>Metering Data Provider</i> <u>for meter types 1-4</u> that enables the <i>Metering Data Provider</i> to collect the <i>metering data</i> and to maintain the clock of the <i>metering installation</i> in accordance with clause 7.12.'</p>
7.9.4 (e)	<p>Where a <i>Metering Data Provider</i> receives notification under paragraph (d), the <i>Metering Data Provider</i> must use its best endeavours to provide corrected <i>metering data</i> to <i>AEMO</i> within 24 hours or advise <i>AEMO</i> that this time limit cannot be achieved, and the reason for delay, in which case the parties must agree on a revised time limit by which the corrected <i>metering</i></p>	<p>Generally the office support and field crews for MP and MDP operate on a business day basis. Rather than a 24 hour turn around which requires a service provider to have a round the clock staff. We suggest that a 1 business day requirement would suffice.</p>	<p>Amend 24 hours to 1 business day.</p>

Clause Number	Clause	Issue	Response
	<i>data will be provided.</i>		
7.9.5 (c)	If any substitution is required under paragraph (b), <i>AEMO</i> must request the <i>financially responsible Market Participant</i> to arrange for a suitable substitution of the incorrect <i>metering data</i> to be undertaken in accordance with the recommendations of any audit report provided by <i>AEMO</i> (under clauses 7.6.1(j), 7.6.3(a) and 7.6.3(d)), or if no audit report is provided, in accordance with the substitution requirements of the <i>metrology procedure</i> .	If data needs to be substituted then it should be the LNSP or the FRMPs responsibility to substitute the data in accordance with the Rule Determination, as one of these parties will be responsible for the MDP services.  If the RP is responsible for end to end meter provision and meter data services is adopted, then the drafting should be amended to RP.	Amend drafting so the obligation rests with the party responsible for engaging the MDP.
7.11.1 (a)	In accordance with paragraphs (b) and (c), <i>AEMO</i> requires delivery of <i>interval metering data</i> for all <i>trading intervals</i> where the <i>metering installation</i> has interval data capability and has the capability for <i>remote acquisition</i> of this data.	The term ‘has the capability for remote acquisition’ is ambiguous. A type 5 interval meter has a port that is capable of linking to a mobile phone facility ie the metering installation has the capability, a Victorian AML meter may be installed and have the capability of remote acquisition, however if the communication network is not yet installed in the area, the meter will not be operating remotely. Clarity would be increased if the meter was remotely collecting data.	In accordance with paragraphs (b) and (c), <i>AEMO</i> requires delivery of <i>interval metering data</i> for all <i>trading intervals</i> where the <i>metering installation</i> has interval data capability and <del>has the capability for remote acquisition of this data.</del> <u>where data is collected by remote acquisition</u>
7.11.1 (b) (2), 7.11.1 (c) (2) and 7.11.1 (d) (2)	within the timeframe required for <i>settlements</i> and <i>prudential requirements</i> specified in the <i>metrology procedure</i> , and the relevant <i>service level procedures</i> ;	The Metrology Procedure is required to cover the delivery and timeframes of data for settlement and prudentials for <u>all</u> meter types as required by 7.14.1 (c). Clause 7.14.1 (c) (4) (ii) specially covers the timeframe obligations to deliver metering data for settlement.	The words ‘,and relevant service level procedures’ should be deleted. The Rules require the obligations/details to be in the metrology procedure and for these requirements to be used for the purpose of settlements.

Clause Number	Clause	Issue	Response
		These three sub clauses in 7.11 should have one procedure where the requirement is specified and not multiple procedures where the obligations are specified. This would provide clarity of which procedure is the key obligation and which is a secondary obligation to the extent of any inconsistency.	
7.11 .1 (c) (3)	actual, substituted or estimated in accordance with the standards related to performance requirements as specified in the <i>metrology procedure</i>	The drafting in this clause should be limited to actual, substituted or estimated in accordance with the metrology procedure. This would also make the drafting consistent with 7.11.1 (b) (3) and 7.11.1 (d) (3).	actual, substituted or estimated in accordance with the <del>standards related to performance requirements as specified in the</del> <i>metrology procedure</i>
7.11.1 (e)	Despite anything to the contrary in the <i>Rules</i> , AEMO may obtain <i>metering data</i> directly from a <i>metering installation</i> for the <i>settlement process</i> .	As noted above in our response , smart metering technology is more complex and whilst AEMO could visit meters in the field, downloading significant volumes of metering data in the field is not practical.	
7.11.2 (a) (1)	collecting <i>metering data</i> by manual reading or by <i>remote acquisition</i> ;	As drafted this appears to imply that every meter needs to be able to be manually and remotely read as opposed to one or the other reading method.	
7.11.2 (b)	<i>Metering Data Providers</i> may provide additional data services that exceed the minimum requirements of the <i>Rules</i> , <i>service level procedures</i> or the <i>metrology procedure</i> at the request of a relevant <i>Market Participant</i> or <i>Local Network Service Provider</i> provided that:	This appears to imply that all the national smart meter customer services or network services might be provided by the MDP. The drafting seems to pre-empt the NSSC rule change recommendation despite the fact that the AEMC purport not to have made any smart metering changes.  UED previously suggested that commercial arrangements be with the RP and not the MDP in	We suggest that this Rule be deleted at this time.  We understand that the AEMC do not intend to make Rules that impact smart metering. Additional features may be agreed with the RP in 7.3.1 (c) and the use of these features as services agreed with the RP in clause 7.3.1 (g).

Clause Number	Clause	Issue	Response
	(1) the full costs of this work is met by the <i>Market Participant</i> or <i>Local Network Service Provider</i> , and (2) the provision of additional data services must not impact the provision of <i>metering data services</i> .	order to reflect the RP obligations in relation to metering and data security and integrity.  The AEMC drafting is inconsistent with the Draft Rule in clause 7.3.1 (g) where the use of additional features needs to be agreed with the RP.	
7.11.3 (a) (2)	following the retention under subparagraph (1), in an accessible format for a period of 5 years and 11 months	The lead in clause to 7.11.3 (a) (2) requires that the MDP retain metering data in the metering data services database. The requirement in (a) (1) is to retain the metering data in the metering data services database for 13 months. The requirement in clause (a) (2) is intended that the data may be held off line, ie not in the metering data services database in an accessible format for a further 5 years and 11 months.	The drafting in the lead in for clause (a) and (a) (2) should clarify that the retention of metering data does not need to be in the metering data services database.
7.11.3 (c)	<i>Metering Data Providers</i> must maintain <i>electronic data transfer</i> facilities in order to deliver <i>metering data</i> from the <i>metering data services database</i> to the <i>metering database</i> in accordance the relevant <i>service level procedures</i> .	The requirement to deliver data or to provide the access to the metering data are covered in the metrology procedure 7.14.1 (c) (1) (iv) and 7.14.1 (c) (4).  In the Rule Determination to clause 7.11.3 (d) the AEMC states in their detailed comments that the performance standards are in the service level procedure. However, in clause 7.11.1 (b) (4), 7.11.1 (c) (4), 7.11.1 (d) (4) and 7.14.1 (c)(4) (iii) these same performance standards are in the metrology procedure.  The Rule Determination and the Draft Rule should be consistent. We suggest that the performance standards be in the metrology procedure and that	<i>Metering Data Providers</i> must maintain <i>electronic data transfer</i> facilities in order to deliver <i>metering data</i> from the <i>metering data services database</i> to the <i>metering database</i> in accordance <u>with</u> the relevant <u><i>service level procedures</i></u> metrology procedure.

Clause Number	Clause	Issue	Response
		this be consistent across the whole of Chapter 7.	
7.11.3 (e)	If the <i>Metering Data Provider</i> becomes aware that the <i>metering data</i> that has been delivered into the <i>metering database</i> from a <i>metering data services database</i> is incorrect, then the <i>Metering Data Provider</i> must notify the <i>Market Participant</i> , the <i>Local Network Service Provider</i> and <i>AEMO</i> within 24 hours of detection.	Generally the office support for the MDP operate on a business day basis. Rather than a 24 hour turn around which requires a service provider to have 24 by 7 staff. We suggest that a 1 business day requirement would suffice.	Amend 24 hours to 1 business day.
7.11.3 (f)	<i>Metering data</i> may only be altered by a <i>Metering Data Provider</i> except in the preparation of <i>settlements ready data</i> by , in which case <i>AEMO</i> may alter the <i>metering data</i> in accordance with clause 7.9.4(d).	In clause 7.9.4 (f), <i>AEMO</i> must prepare substitutes in accordance with the metrology procedure. 7.9.4 (d) requires <i>AEMO</i> to notify the MDP if data is missing.  UED suggest the appropriate reference is 7.9.4 (f).	Amend 7.9.4 (d) to 7.9.4 (f)
7.11.3 (i)	The <i>Metering Data Provider's</i> rules and protocols for the collection of <i>metering data</i> from a <i>metering installation</i> must be approved by <i>AEMO</i> and <i>AEMO</i> must not unreasonably withhold such approval.	It is unclear why this is required. The MDP has had to seek accreditation (or re-accreditation for new systems), the performance of the MDP is monitored each month and the MDP is audited on at least a 6 or 12 monthly basis. The MDP already has the obligation to comply with the Rules and metrology procedure regarding data collection, data delivery and data processing requirements etc.  The AEMC states that this clause is required to	Delete the clause it is unnecessary and inefficient.

Clause Number	Clause	Issue	Response
		<p>ensure that collection methods are fundamentally sound in delivering data to AEMO and the market with the required quality. Given the continual level of monitoring by AEMO, this clause is additional regulatory burden for no value. The AEMC should clearly state why further additional assessment mechanisms are required by AEMO and how the extra regulatory burden contributes favourably to the NEO. What is the market failure in the current accreditation and monitoring processes AEMO has in place?</p>	
7.11.3 (j)	<p>The <i>Metering Data Provider</i> must arrange with the party responsible for the provision of metering data services for a particular metering installation (either the <i>financially responsible responsible Market Participant</i> or the <i>Local Network Service Provider</i> as the case may be) to obtain the relevant <i>metering data</i> if <i>remote acquisition</i>, if any, becomes unavailable. , and the <i>responsible person</i> must assist the <i>financially responsible Market Participant</i> in obtaining that <i>metering data</i>.</p>	<p>The AEMC Rule Determination has determined that there should not be one party accountable for end to end processes. As technology becomes more complex this clause allows the MDP to fix up all the problems with their systems and processes or communications networks by placing a Rule obligation on the RP role to provide the stop gap fix. As technology becomes more complex under smart metering, this clause promotes inefficiency.</p> <p>Using Rules and processes that have applied to large customers automatically across all customers sizes and emerging technologies is not appropriate or efficient and does not contribute to the NEO.</p>	<p>Suggest the clause is deleted and the AEMC revert to the original AEMO proposal that one party, the RP is accountable end to end for technology and service delivery regardless of whether the services are from basic meters, remotely read meters or smart meters.</p>
7.12 (f)	<p>The <i>Metering Data Provider</i> must: (1) set the clock of the <i>metering installation</i> so that it is referenced to <i>Eastern Standard Time</i> to a</p>	<p>The redrafting of this clause has sought to move the obligation from the RP (MP) to maintain the accuracy of clock setting in the metering installation to the MDP.</p>	<p>AEMC should reconsider the drafting in 7.12 (a) and 7.12 (f) to ensure that time setting obligations are clearly with one</p>

Clause Number	Clause	Issue	Response
	<p>standard of accuracy in accordance with schedule 7.2 relevant to the <i>load</i> through the <i>connection point</i> on each occasion that the <i>metering installation</i> is accessed;</p> <p>(2) reset the clock of the <i>metering installation</i> so that it is maintained to the required standard of accuracy in accordance with schedule 7.2 relevant to the <i>load</i> through the <i>connection point</i> where the clock error of a <i>metering installation</i> does not conform to the required standard of accuracy on any occasion that the <i>metering installation</i> is accessed;</p> <p>and</p> <p>(3) notify the <i>Metering Provider</i> where the <i>Metering Data Provider</i> is unable to reset the clock of the <i>metering installation</i> in accordance with subparagraph (2).</p>	<p>The Draft Rule in 7.12 (a) has the MP setting the clock on installation, testing and maintenance.</p> <p>Clause 7.12 (f) (1) has the MDP setting the clock every time the meter is accessed. If a meter is polled or accessed every few hours, then the MDP <u>must</u> set the clock in 7.12 (f) (1) and re-set the clock in 7.12 (f) (2).</p> <p>Where a meter is accessed or polled every few hours, UED consider that it is not appropriate that the MDP set or reset the clock on each access if the clock accuracy is within the Rules/metrology requirements. It is important to ensure clock accuracy, however it is also important to be able to assess if there is drift in the clock setting and over what periods of time so that it can be managed.</p> <p>The Rules drafting should focus on the party with the obligation and the desired outcome and not prescribe how it is achieved.</p>	<p>service provider. MP for initial installation and the MDP for ongoing maintenance. The obligations need to be practical and avoid a requirement to fiddle with the time settings on each occasion that the meter is accessed. Time settings should only be adjusted as required to meet the accuracy in schedule 7.2.</p>
S7.2.1 (b)	<p>A <i>Registered Participant</i> require the <i>responsible person</i> to arrange for a <i>metering installation</i> to meet a higher level of accuracy, with the full costs of this work being met by that <i>Registered Participant</i>.</p>	<p>Suggest inserting the word may.</p>	<p>A <i>Registered Participant</i> <u>may</u> require the <i>responsible person</i> to arrange for a <i>metering installation</i> to meet a higher level of accuracy, with the full costs of this work being met by that <i>Registered Participant</i>.</p>
S7.6.2		<p>Citipower and Powercor suggested that the table make reference to the fact that type 5D and 6D may be manually or remotely read.</p>	<p>To assist with clarity the 5D and 6D category should refer to manual or remote collection of</p>

Clause Number	Clause	Issue	Response
		<p>The AEMC responded that the exception that allows remote reading requires that this would be accredited in category 4D. This statement is inconsistent with the Rules as 7.3.4 (g) clearly states that the meter does not need to be considered a type 4 meter.</p>	<p>metering data.</p>
	<p><b>metering data services database</b> The database established and maintained by the <i>Metering Data Provider</i> that holds the <i>metering data</i> and relevant <i>NMI Standing Data</i> relating to each <i>metering installation</i> for which the <i>responsible person</i> has engaged the <i>Metering Data Provider</i> to provide <i>metering data services</i>.</p>	<p>The definition is inconsistent with the AEMC Draft Rule Determination. The FRMP or the LNSP is responsible for engaging the MDP to provide the metering data services.</p>	<p>Remove the reference to responsible person and replace with the LNSP or FRMP.</p>
	<p><b>service level procedures</b> The procedures established under the <i>Rules consultation procedures</i> by <i>AEMO</i> in accordance with clause 7.2.9.</p>	<p>There is no clause 7.2.9. A more appropriate reference might be 7.14.1A or 7.1.3 (b).</p>	<p>Amend the reference.</p>
	<p><b>telecommunications network</b> A telecommunications network that provides access for public use or an alternate telecommunications network that has been approved by AEMO for the <i>remote acquisition of metering data</i>.</p>	<p>There has been no activity in the market or by AEMO on this specific clause.</p> <p>The AEMC states that this is required as AEMO is required to understand the reliability, security and standards of these systems so that settlements requirements are met.</p>	<p>Suggest moving an obligation related clause into Chapter 7.</p>

Clause Number	Clause	Issue	Response
		<p>If there is an obligation on AEMO to approve these non public networks then this should be in Chapter 7 as opposed to a glossary. The clause should also provide clarity on who is seeking approval or who has the obligation to ensure that approval is sought before a private network is used.</p>	